

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DELTA PILOTS ASSOCIATION,  Plaintiff  v.  JOHN DOE,  Defendant.	Civil Action No.: 1:14-cv-00225-AKH  <b>[PROPOSED] ORDER</b>
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This matter, having come before this Court on Plaintiff's motion to compel the Air Line Pilots Association International and its subordinate body, the Delta Master Executive Council (together, "ALPA") to comply with subpoenas *duces tecum* served upon it, the Court having considered Plaintiff's motion, the pleadings filed in this action, and for good cause, therefore,

**IT IS SO ORDERED** that ALPA shall, within five (5) calendar days after issuance of this Order, comply with the subpoena(s) by producing the following documents to counsel for Plaintiff:

- 1) Documents that contain, describe or reference any facts learned or information generated in any investigation by ALPA or the ALPA Delta MEC, as stated in the publication, True Headings, 13-17 dated November 21, 2013.
- 2) The November 19, 2013 e-mail from an anonymous author to ALPA attorney Arthur Luby, either in native digital format or in digital pdf format, or in hardcopy, provided expanded headers are visible;
- 3) Any attachment to the email.

The produced documents may be redacted only for content that contains attorney-client privileged communications, if any, not for the identity of the author of any document, provided a privilege log in compliance with Fed. R. Civ. P. 26(d)(5) is also produced.

**IT IS FURTHER ORDERED** that the Air Line Pilots Association shall be subject to sanctions if it unreasonably fails to comply with this Order.

DATED: July \_\_\_, 2014

By: \_\_\_\_\_

Hon. Alvin K. Hellerstein  
United States District Judge